## **REMARKS**

Pending in the application are claims 1-20, of which claims 1, 14, 15 and 19 are independent. The following comments address all stated grounds for rejection and place the presently pending claims, as identified above, in condition for allowance.

## Claim Rejections Under 35 USC § 102

Claim 14 is rejected under 35 U.S.C. §102 (b) as being anticipated by Applicant's Admitted Prior Art (AAPA), fig. 1. Applicant respectfully traverses the rejection and submits that claim 14 distinguishes over the AAPA. The Examiner considers the latching groove 29 of the jack 20 in the AAPA to be a ridge. In fact, the latching groove 29, which has a depressed configuration, has the opposite configuration from a ridge, which is raised, rather than depressed. In addition, the jack 20 of the AAPA does not receive a "wired end" of a plug, as recited in claim 14. Rather, the jack receives only the non-wired end of the plug 30, while the wired end of the plug 30 protrudes from and away from the jack 20.

The Examiner has not provided support for her position that claim 14 is anticipated, other than repeating the recitations in the claim. In particular, the Examiner has not indicated how or where the AAPA discloses the recitation of a plug receptacle sized and configured to receive a wired end of plug. Because the AAPA does not disclose each and every recitation of claim 14, the rejection under 35 U.S.C. §102(b) should be reconsidered and withdrawn.

Claims 19 and 20 are rejected under 35 U.S.C. §102(b) as being anticipated by Tubbs (U.S. Patent Number 4,648,682). The Tubbs reference does not disclose a plug receptacle for receiving a <u>wired end</u> of a plug, as recited in claim 19, or a plug receptacle that receives a plug such that a mating end of the plug protrudes from the first end of the plug housing when retained by the receptacle, as also recited in claim 19.

Applicant submits that the modular adaptor 30 of Tubbs includes a jack portion 34 for receiving a <u>mating</u> end of a plug, rather than a *wired* end, as recited in claim 19. In addition, a *mating* end of a plug does not <u>protrude from</u> the jack portion 34 in Tubbs, as also recited in claim 19. Rather a first plug is inserted into the jack portion 34, with the <u>wired</u> end protruding and directed *away* from the jack portion 34. A second plug in Tubbs is connected to the first plug, but the second plug does not mate in any way with the jack portion 34. Therefore, the Tubbs

reference does not disclose the subject matter of claims 19 and 20, and the rejection of claims 19 and 20 under 35 U.S.C. §102(b) should be reconsidered and withdrawn.

The Tubbs reference also does not disclose a threaded strain relief, as recited in claim 20. The element 64 in Tubbs, which the Examiner considers to be a strain relief, is in fact the housing for the connector 44, not a threaded strain relief.

## Claim Rejections Under 35 USC § 103

Claims 1, 2, and 6-12 are rejected under 35 U.S.C. §103(a) as being anticipated by Behning 5,167,522 in view of Eshleman et al 4,070,080. As recognized by the Examiner, Behning reference does not disclose connector housings providing releasable housing of connector halves. According to the Examiner, because the Eshleman reference discloses a connector assembly having connector housings with receptacles for housing portions of a mating connector, claims 1, 2 and 6-12 are obvious. Applicant respectfully disagrees.

The Eshleman reference describes mating pins 36 and sockets 22 in a receptacle 12 and plug 10, respectively. Even if the socket portion 24 and the pin contacts 34 can be considered "connector halves" there is no teaching or suggestion that the mating pins and sockets are *releasably* held in the receptacle and plug. Figure 1 of Eshleman is merely an *exploded* view of a connector, and does not show that the mating pins 36 and sockets 22 are <u>releasably</u> received by the receptacle 12 and plug 10, as recited in claims 1, 2 and 6-12.

Furthermore, there is no motivation to modify the teachings of the Behning reference using the Eshleman reference. The Examiner has not provided an objective reason for modifying and/or combining the references, and therefore fails to make a *prima facie* case of obviousness.

The dependent claims recite additional patentable features not disclosed in the cited references. For examples, the cited references fail to disclose a retaining system for releasably retaining a connector half therein, as set forth in claims 6-9, in particular a retaining system comprising grooves, as recited in claims 7-8. The cited references also do not disclose a retaining system including a ridge in a receptacle for engaging a groove on a connector half, as set forth in claim 10. The Examiner considers the keyways 26 and 27 in Behning to be retaining

grooves and keys 23, 24 to be ridges of a connector half retaining system. However, the keyways 26 and 27 are configured to interface with the keys 23 and 24 to guide two connector housings together, (i.e., the plug body 1 into the receptacle 7), rather than releasably retain a connector half in a corresponding housing. Therefore, none of the components cited by the Examiner are capable of releasably retaining a connector half in a connector housing.

In addition, the nut mentioned in column 2, lines 5-8 is not a strain relief, nor does the connector in Behning include a threaded portion for engaging a strain relief for a cable, as recited in claims 11 and 12.

Regarding claims 5 and 13, the cited references do not disclose the claimed disabling groove for disabling a latching lever arm on the second connector half. The groove 29 cited by the Examiner is a *latching* groove for engaging a lever to retain a plug in a jack and is not formed in a <u>connector housing</u>, but in a jack (i.e., a connector half). The latching groove does not disengage or disable a lever, as set forth in claims 5 and 13, but performs an opposite function. The claimed lever disabling groove maintains a latching lever arm of a plug in a depressed position when the plug is retained in the corresponding housing. The disabling of the lever arm allows the plug and jack to be easily coupled and de-coupled through the coupling and decoupling of the connector housings, without requiring a user to activate the cumbersome latch. In contrast, the AAPA requires a user to activate the latch to couple and decouple the plug and jack. Therefore, the AAPA does not disclose the claimed lever disabling groove, even though the claims are patentable nevertheless as depending on a patentable independent claim.

Claims 3 and 4 are rejected under 35 U.S.C. §103(a) as being unpatentable over Behning in view of Eshleman et al. as recited in claim 1, and further in view of Bradley et al. 5,240,436. As described above, claim 1 is patentable over the cited references. Therefore, claims 3 and 4 are also patentable over the cited references. In addition, the Examiner's rejection is improper, because there is no motivation to modify the connectors of the Behning reference and the Eshleman reference to be able to house a RJ-45 jack and a RJ-45 plug. In addition, nothing in the Bradley reference discloses a mating RJ-45 jack and plug releasably held in connector housing halves. Rather, the Bradley reference is concerned with converting a BNC connection to a RJ connection.

Claims 15-18 are rejected under 35 U.S.C. §103(a) as being unpatentable in view of Tubbs 4,648,682. Applicant respectfully disagrees. The Tubbs reference does <u>not</u> disclose a first <u>cavity</u> formed the <u>back</u> of a jack housing for receiving and retaining a jack <u>in</u> the first cavity. The Tubbs reference also does not or a second cavity in the <u>front</u> of the jack housing for receiving a telescoping portion of a plug housing. The Tubbs reference also does not disclose a jack retaining system for *releasably* retaining a jack <u>in</u> the first cavity.

Rather, the Tubbs reference discloses a jack-receiving opening 36 formed on a top surface of the housing 32, rather than in a back of a jack housing. There is no teaching or suggestion that the opening 36 *releasably* retains the jack 42. In addition, the housing 32 of Tubbs does not disclose a <u>front</u> cavity for receiving a plug housing. The plug-receiving portion 46 cited by the Examiner is not a front cavity of a <u>jack housing</u>, but rather, an opening in the actual jack.

Therefore, claims 15-18 also distinguish patentably over the Tubbs reference.

## **CONCLUSION**

For the foregoing reasons, Applicant contends that claims 1-20 are allowable. As such, the Applicant respectfully requests that all outstanding rejections be reconsidered and withdrawn, and that the application be passed to allowance.

If there are any remaining issues, an opportunity for an interview is requested prior to the issuance of another Office Action. If the above amendments are not deemed to place this case in condition for allowance, the Examiner is urged to call the Applicant's representative at the telephone number listed below.

Applicant believes no additional fee is due with this response. However, if an additional fee is due, please charge our Deposit Account No. 12-0080, under Order No. ALS-018 from which the undersigned is authorized to draw.

Dated: December 21, 2005

Respectfully submitted,

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